

## **Exhibit 3**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AFT MICHIGAN,

Plaintiff,

-vs-

Civil Case No. 17-cv-13292

Hon. Elizabeth A. Stafford

PROJECT VERITAS, and MARISA L.

JORGE, a/k/a MARISSA JORGE, a/k/a

MARISSA PEREZ,

Defendants.

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The Videotaped Deposition of RUSSELL VERNEY,  
Taken at One Barker Avenue,  
White Plains, New York, 10601  
Commencing at 10:00 a.m.,  
Wednesday, January 22, 2020,  
Before Kelly Forfar, CSR-3618.

1 APPEARANCES:

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8 Appearing on behalf of the Plaintiff.

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17 Appearing on behalf of the Defendants.

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16 Appearing as counsel for Project Veritas.

17  
18  
19  
20 ALSO PRESENT:

21 - Videographer - Michael Chait

22 - Jessica Rutter and Brad Murray

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 Q. Did you participate in conversations where those  
12 investigations, the ones to be implemented, were discussed in  
13 greater detail?

14 A. I have no specific recollection but I engaged in  
15 discussions of all of our investigations.

16 Q. Do you know how the idea of teacher union  
17 investigations was raised within Project Veritas?

18 A. It was a follow-on to the ones that had been done  
19 previously that discovered the drugs and the abuse of a child  
20 by a teacher in another state, various -- various situations  
21 that we had discovered; it was a continuation on of those.

22 Q. Was -- did any person not associated on a personal  
23 or professional level with Project Veritas have any input, as  
24 far as you know, into what investigations would be conducted  
25 with respect to teacher unions during 2017 or 2018?

1 A. No.

2 Q. The entire concept was discussed and developed  
3 internally, as far as you know?

4 A. Yes, sir.

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]